

January 5, 2006

Marine Life Protection Act  
Science Advisory Team  
c/o Mr. John Kirlin  
California Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

VIA FAX: (916) 653-5674

Dear Members of the MLPA Science Advisory Team,

We appreciate the opportunity to comment on and participate in the Marine Life Protection Act stakeholder process. Though we did not have a seat on the Central Coast Regional Stakeholder Group, we participated by gathering data, integrating data with other datasets in a Geographic Information System, and submitting a document containing our analysis of Ecologically Important Areas of the Central Coast. We identified these areas (see attached Map 1) within the Central Coast Region where the data warranted additional monitoring, management, and varying degrees of protection in order to achieve the goals of the MLPA. To assist in developing appropriate boundaries for management measures, we subdivided our Ecologically Important Areas into 51 subregions (Map 2).

We commend the work of the Central Coast Regional Stakeholder Group (RSG) and we have reviewed their proposals carefully and thoroughly. Based on our analysis, we found that many of the areas we identified have been included in the RSG proposal package. However, the RSG suite of proposals does not include several key areas containing high ecological components in any of the alternatives put forward.

It is not our intention to delay the MLPA process in any way. But, given the importance of the Central Coast study area to the California Current Large Marine Ecosystem, we believe it would be irresponsible for us not to highlight specific areas that are missing from the RSG proposals that would improve the effectiveness of an MPA network. Therefore, we have used our resources to bring these areas to the attention of the SAT and Blue Ribbon Task Force for additional discussion and consideration in the Central Coast MLPA process. We show these areas overlaid with the areas put forward in the RSG proposals in our attachment Map 3. The ecological features of areas in Map 3 are discussed in the attached *Matrix of Key Areas that Warrant Additional Discussion*.

***An Ecosystem-based Approach to Central Coast MPAs***

The MLPA process is an incredible opportunity to begin Ecosystem Based Management in California. While many management tools can be used to manage the California Current Large Marine Ecosystem, marine protected areas can play a unique, critical role in the management of the California Current Large Marine Ecosystem's resources. An effective way to evaluate the

extent to which MPA networks meet the goals of the MLPA is to examine how spatial management affects different parts of the marine ecosystem. We have identified four key components of the California Current marine ecosystem and discuss how MPA networks can be designed to most effectively protect each component:

*1. Protect benthic species.*

98% of all known marine species live on or in the seafloor (Thurman, Harold V. and Elizebeth Burton, 2001). The MLPA specifically calls for protection of biodiversity. Benthic species with small home ranges and large dispersal distances can benefit from spatial harvest protections of appropriate size and spacing. We commend the Science Advisory Team for your attention to this issue in the Scientific Guidelines which were adopted into the Master Plan Framework. The Regional Stakeholder group relied heavily on these guidelines for groundfish protections. However, many invertebrates which could benefit from MPAs are not protected.

*2. Protect habitat*

Living features of the seafloor provide three dimensional structure that forms habitat for marine life. Deep sea corals, sponges, and their associated species likely enhance populations of groundfish and unique ecological assemblages. These biogenic habitats can be sensitive to incidental damage caused by bottom fishing gear. Bottom trawling, in particular, is known to reduce the biodiversity, complexity, and productivity of benthic habitats (NRC 2002). However, the RSG proposals do not adequately address bottom trawling in Monterey Bay and many key submarine canyon and rocky substrate habitats are not protected from bottom contact in the RSG proposals.

*3. Protect top predators*

Seabird colonies and marine mammal rookeries are sensitive to direct disturbance by human activities. Lights, noise, and encroachment within ¼ mile of these areas may threaten seabird and mammal populations in this area by decreasing nesting success and juvenile survivorship (Gerry McChesney (USFWS) pers. comm.). MPAs that prohibit these threats can be highly targeted in space, but have major benefit to these populations.

*4. Protect the forage base*

Key forage species in the California Current include krill, squid, anchovies, sardines, and mackerel. Populations of commercial and non-commercial marine species depend on abundant populations of forage species at key foraging locations such as upwelling zones, seabird nesting sites, and marine mammal rookeries. While other management tools, such as quotas, may address total populations of forage species, MPAs can play a unique role by affecting the spatial distribution of these populations. For example, though squid populations are highly migratory, MPAs that protect squid from harvest in upwelling areas, seabird nesting sites, and marine mammal rookeries will enhance the availability of forage to higher trophic levels when the squid travel through those areas. Several of these areas on the Central Coast are not addressed in the RSG proposals.

The remainder of this document provides a detailed description of 10 key areas that warrant additional management measures and monitoring.

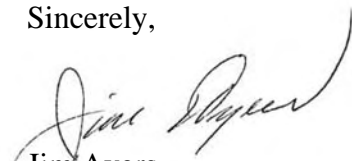
These areas include

1. Monterey Bay shelf habitat
2. Santa Cruz/Natural Bridges reefs
3. Monterey Canyon benthic habitat
4. Deep reefs (>60 ft) surrounding Monterey Peninsula
5. Hurricane Point/Castle Rock Seabird Complex
6. Cape San Martin
7. Point Buchon
8. Pismo-Oceano Beach
9. Point Sal
10. Point Arguello (Safety Zone 5)

The attached maps 4-11 show these areas in detail overlaid with the ecological features from the MLPA GIS database. On each map, we also show areas that are addressed in the RSG proposals to the best of our ability.

We hope you find this information useful as you embark on your task of evaluating stakeholder proposals and making recommendations to the California Fish and Game Commission. Please feel free to contact us if you have any further questions, and we look forward to continuing to work with you to protect California's marine resources.

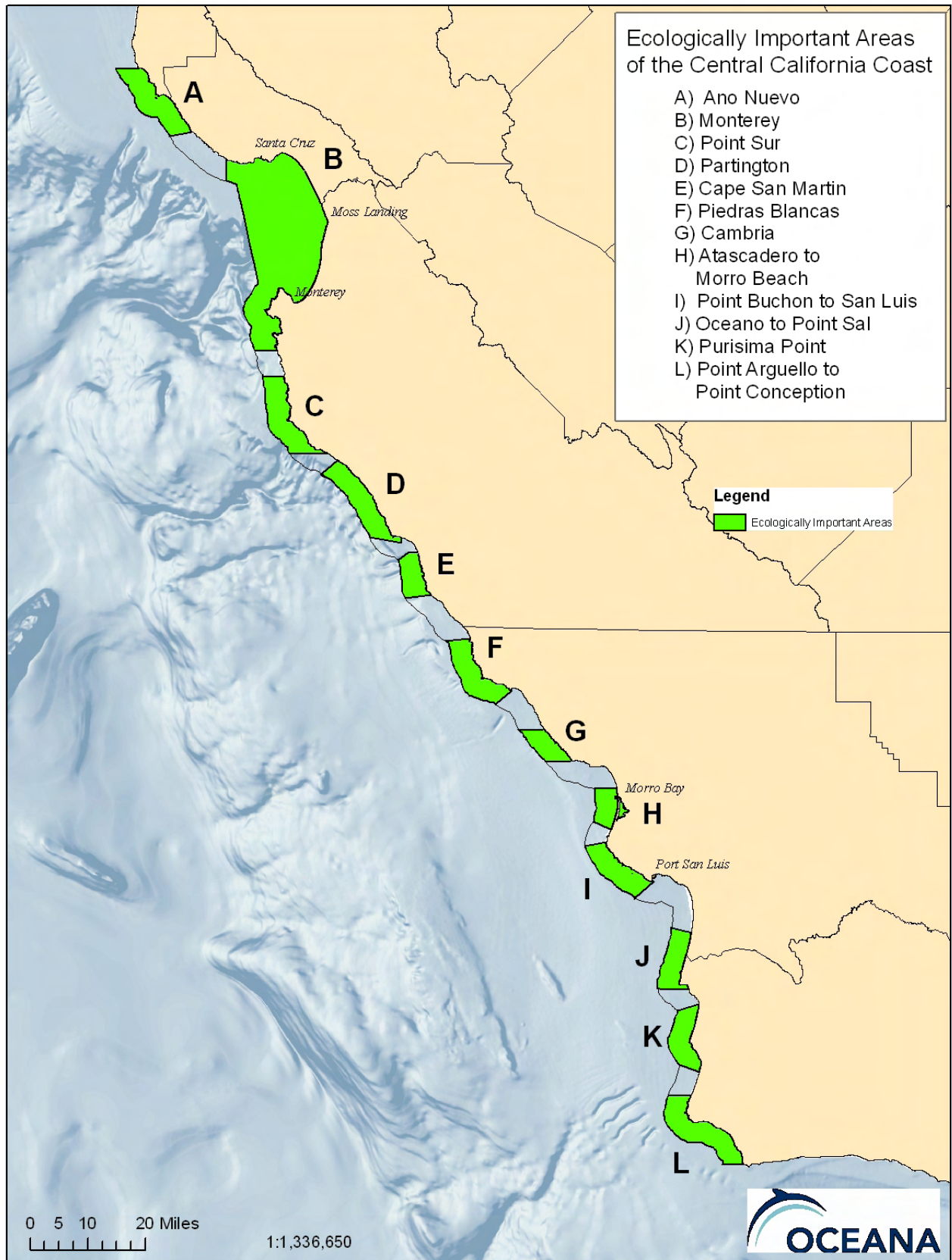
Sincerely,



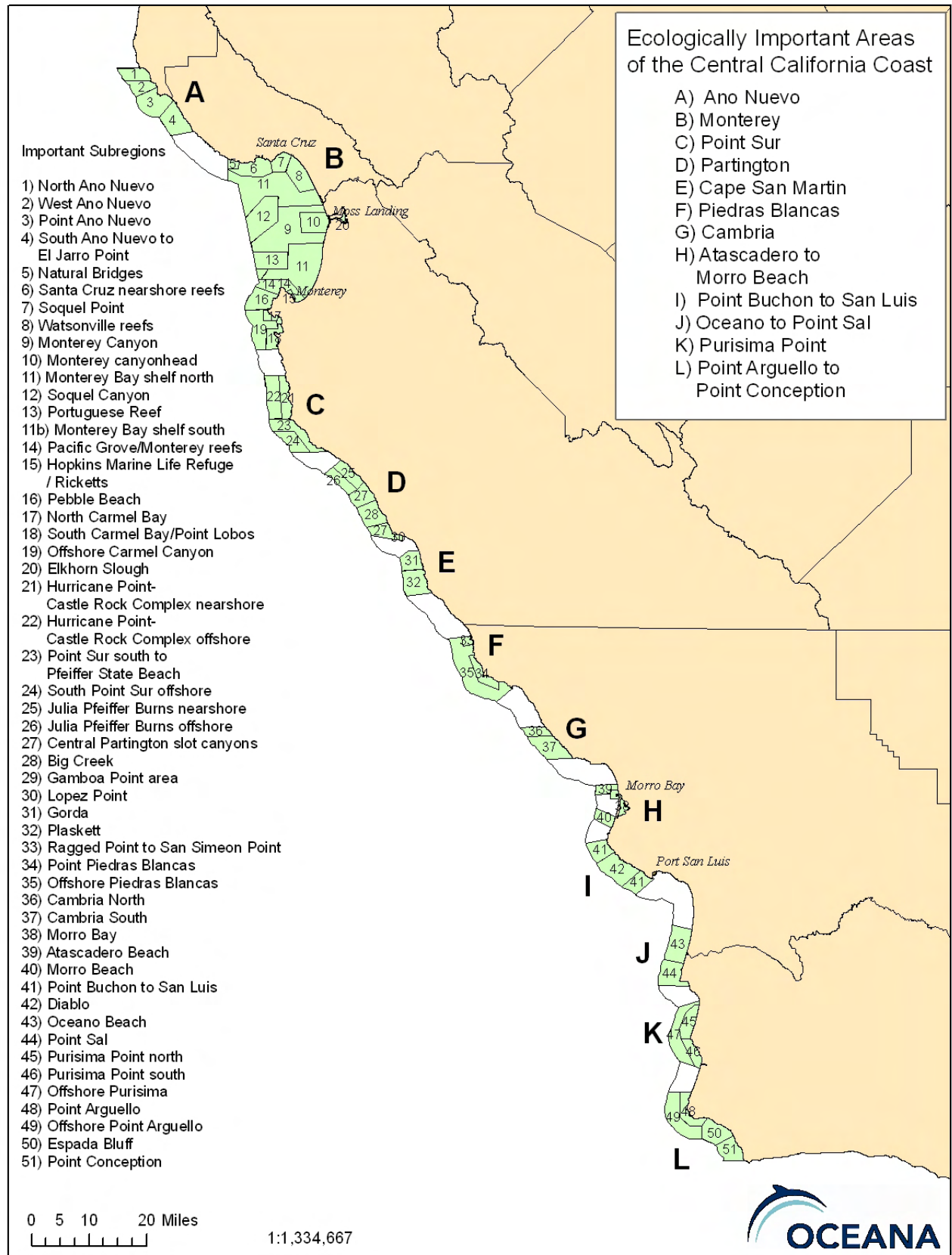
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**Map 1: Ecologically Important Areas**



**Map 2: Ecologically important areas divided into 51 sub-areas**





**Map 3: Areas under discussion in RSG proposals and areas warranting additional discussion**

